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*Interim Lead Counsel and Liaison Counsel
for the Direct-Purchaser Plaintiffs and the
Proposed Class*

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(OAKLAND DIVISION)**

**IN RE STATIC RANDOM ACCESS
MEMORY (SRAM) ANTITRUST
LITIGATION**

Case No. M:07-CV-01819-CW

MDL No. 1819

This Document Relates To:

**ALL DIRECT
PURCHASER ACTIONS**

**STIPULATION
ORDER EXTENDING TIME TO
FILE MOTION FOR CLASS
CERTIFICATION
[CIVIL LOCAL RULE 6-2]**

WHEREAS, on June 1, 2007, a Case Management Conference was held before the Court in the coordinated proceedings *In re Static Random Access Memory (SRAM) Antitrust Litigation*, Case No. M:07-cv-1819-CW;

1 WHEREAS, the Court's CMC order dated June 8, 2007, requires the Direct Purchaser
2 Plaintiffs to file their Motion for Class Certification and expert reports in support thereof on
3 **February 15, 2008** with Defendants' Opposition to be filed on **April 17, 2008**, and the Direct
4 Purchaser Plaintiffs' Reply to be filed on **May 1, 2008**;
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7 WHEREAS, Direct Purchaser Plaintiffs filed their Consolidated Class Action
8 Complaint ("CCAC") on August 31, 2007;
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10 WHEREAS, Defendants filed Motions to Dismiss the CCAC on October 22, 2007;
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12 WHEREAS, a hearing was held before the Court regarding those Motions to Dismiss on
13 December 20, 2007;
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15 WHEREAS, the Minute Order from the December 20, 2007 stated that "After Court
16 issues order on motions [to dismiss], counsel to meet and confer re adjusting CMC dates for
17 class certification."
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19 WHEREAS, as of the date this stipulation, the Court has yet to issue orders regarding
20 the Motions to Dismiss the CCAC;
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22 WHEREAS, the Parties identified below agree to an extension as follows:
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1 **Direct Purchaser Plaintiffs shall file their Motion for Class Certification and expert**
2 **reports in support thereof 90 days after the pleadings are settled between the Direct**
3 **Purchaser Plaintiffs and the Defendants**¹, meaning the latter of:

- 4
- 5 (i) the date this Court issues its order on the pending Motions to Dismiss the Direct
6 Purchasers' CCAC; or,
- 7 (ii) in the event the pending Motions to Dismiss (or any subsequent Motion to
8 Dismiss filed by any Defendant) are granted with leave to amend, and the Direct
9 Purchaser Plaintiffs file an amended complaint, and any Defendant also files a
subsequent Motion to Dismiss, the date this Court issues its order on the last of
such subsequent motions.

10 NOW THEREFORE, pursuant to Civil Local Rule 6-2, it is hereby stipulated by the
11 undersigned counsel on behalf of the Parties identified below, and subject to the Court's
12 approval, that the deadline for the Direct Purchaser Plaintiffs' to file a Motion for Class
13 Certification, expert reports in support thereof, as well as oppositions and replies to such a
14 Motion, are amended as follows:

- 15
- 16 1. Direct Purchaser Plaintiffs shall file their Motion for Class Certification and expert
17 reports in support thereof **ninety (90) days after the pleadings are settled between**
18 **the Direct Purchaser Plaintiffs and the Defendants.**
- 19 2. Defendants' Oppositions to the Direct Purchaser Plaintiffs' Motion for Class
20 Certification will be due **sixty (60) days after filing of the Direct Purchaser**
21 **Plaintiffs' Motion for Class Certification.**
- 22 3. Direct Purchaser Plaintiffs' Reply will be due **twenty-one (21) days after filing of**
23 **the Defendants' Oppositions to the Direct Purchaser Plaintiffs' Motion for**
24 **Class Certification.**

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26 ¹ Defendants, as the term is used here, includes only those domestic Defendants who had been
27 served with the CCAC and/or filed or joined any of the pending Motions to Dismiss. The term
28 does not include foreign Defendants, so any challenge any foreign Defendant may raise to any
Direct Purchaser Plaintiff complaint does not, by this stipulation, effect the date for filing the
Motion for Class Certification.

1 Dated: February 12, 2008

COTCHETT, PITRE & McCARTHY

2 By: _____/s/_____
3 Steven N. Williams

4 *Lead Counsel and Liaison Counsel for the*
5 *Direct-Purchaser Plaintiffs and the*
6 *Proposed Class*

7 THELEN REID BROWN RAYSMAN &
8 STEINER LLP

9 By: _____/s/_____
10 Paul R. Griffin

11 *Liaison Counsel for Defendants*

12 PURSUANT TO STIPULATION, IT IS SO ORDERED.

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14 Dated: March 10, 2008

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16 Hon. Claudia Wilken

17 United States District Judge
18 Northern District of California
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ATTESTATION OF FILING

Pursuant to N.D. Cal. General Order No. 45, section 45 X(B), I, Steven N. Williams, hereby attest that concurrence in the filing of this stipulation and proposed order has been obtained from Liaison Counsel for Defendants who has provided the conformed signature above.

COTCHETT, PITRE & McCARTHY

By: _____/s/_____
Steven N. Williams

*Lead Counsel and Liaison Counsel for the
Direct-Purchaser Plaintiffs and the Proposed Class*

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